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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM BECKER and BRITTANY BROWN, Individually, and on behalf of V.B., a minor,

Plaintiffs,
v.

CLARK COUNTY SCHOOL DISTRICT; an agency and/or political subdivision of the STATE OF NEVADA; DORYS TOVAR; DOES I-X, Inclusive; ROE Corporations I-X, inclusive,

Defendants.

Case No. : 2 2:23-cv-00603-JCM-NJK

ORDER TO EXTEND
DISCOVERY DEADLINES
(Third Request)

Plaintiffs WILLIAM BECKER, and BRITTANY BROWN, individually and on behalf of V.B., a minor, by and through her attorneys of record MICHAEL C. KANE, ESQ., BRADLEY J. MYERS, ESQ., and NICHOLAS J. DION, ESQ., of THE702FIRM, and Defendants, CLARK COUNTY SCHOOL DISTRICT, by and through their attorney of record KARA HENDRICKS, ESQ. of GREENBERG TRAURIG, LLP, and DORYS TOVAR, by and through her attorney of record, JONATHAN C. PATTILLO, ESQ., of WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP, hereby stipulate and request that the Court approve their request to extend discovery deadlines 45 days pursuant to Local Rule IR 6-1, Local Rule 26-3, and FRCP 26. Pursuant to Local Rule IA 6-1(a), the parties aver that this is the third discovery extension requested in this matter.

1 **A. DISCOVERY COMPLETED TO DATE**

2 The parties have conducted the following discovery to date:

- 3 1. Plaintiff, Clark County School District, and Dorys Tovar conducted
4 an initial FRCP 26(f) conference on June 15, 2023.
- 5 2. Plaintiffs disclosed their initial disclosure pursuant to FRCP 26.1 on
6 June 29, 2023;
- 7 3. Plaintiffs have disclosed their first ECC Supplement pursuant to
8 FRCP 26.1 on July 20, 2023;
- 9 4. Plaintiffs have disclosed their second ECC Supplement pursuant to
10 FRCP 26.1 on November 20, 2023;
- 11 5. Plaintiffs have disclosed their third ECC Supplement pursuant to
12 FRCP 26.1 on January 10, 2024;
- 13 6. Defendant Clark County School District has disclosed their initial
14 disclosure pursuant to FRCP 26.1 on June 29, 2023;
- 15 7. Defendant Clark County School District has disclosed their first
16 ECC Supplement pursuant to FRCP 26.1 on July 20, 2023;
- 17 8. Defendant Clark County School District has disclosed their second
18 ECC Supplement pursuant to FRCP 26.1 on October 13, 2023;
- 19 9. Defendant Clark County School District has disclosed their third
20 ECC Supplement pursuant to FRCP 26.1 on November 22, 2023;
- 21 10. Defendant Dorys Tovar has disclosed her initial disclosure pursuant
22 to FRCP 26.1 on July 21, 2023.
- 23 11. Plaintiffs served written discovery to Defendant Clark County
24 School District on August 25, 2023.
- 25 12. Defendant Clark County School District served written discovery to
26 Plaintiffs on August 16, 2023.
- 27 13. Plaintiffs responded to Clark County School District's written
28 discovery on September 28, 2023.

- 1 14. Defendant Clark County School District responded to Plaintiffs
- 2 written discovery on October 13, 2023.
- 3 15. Defendant Dorys Tovar responded to Plaintiffs written discovery on
- 4 December 1, 2023.
- 5 16. Plaintiffs served their Initial Designation of Expert Witnesses and
- 6 Documents Pursuant to FRCP 26.1 on November 22, 2023.
- 7 17. Clark County School District served their Rebuttal Expert Witness
- 8 Disclosure Pursuant to FRCP 26(a)(2) on December 26, 2023.
- 9 18. Deposition of Mr. Scott D. Thornton, Esq. was conducted on
- 10 January 10, 2023.

11 **B. DISCOVERY TO BE COMPLETED**

- 12 1. Depositions of Plaintiffs;
- 13 2. Deposition of Defendant TOVAR;
- 14 3. Deposition(s) of CCSD and Variety School Employees;
- 15 4. Deposition of CCSDPD Detectives and Officers;
- 16 5. Deposition(s) of relevant medical providers;
- 17 6. Production of V.B.'s medical records;
- 18 7. Deposition of additional relevant third-party witness(es) or
- 19 investigators;
- 20 8. Plaintiff and Defendant Expert Depositions; and
- 21 9. Any Additional Discovery Deemed Necessary.

22 **C. REASON FOR THE REQUESTED EXTENSION OF DISCOVERY**

23 The 702 Firm Injury Attorneys advise this Honorable Court that there has been a breakdown
24 in communication with the current Plaintiffs. On January 11, 2024, The 702 Firm Injury Attorneys
25 began to advise the Defendants (and their counsel) of the communication breakdown. The 702 Firm
26 Injury Attorneys also advised the Defendants and their counsel of their plans to withdraw from
27 this matter. Despite the recent denial of The 702 Firm Injury Attorneys Motion to Withdraw (See
28 Dkt. #27), the communication with the Plaintiffs has not improved – and The 702 Firm Injury

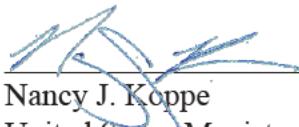
1 Attorneys plan to file a simultaneous Motion to Withdraw.

2 In the interest of allowing Plaintiffs to seek new counsel, the Parties have conferred, believe
3 good cause exists, and therefore Stipulate to extend the deadlines in this matter for a period of **45**
4 days. This is the third discovery extension requested in this matter.

5 **D. PROPOSED NEW DEADLINES**

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Amend Pleadings or Add Parties	07/25/2023	Expired
Initial Expert Disclosure Deadline	11/22/2023	Expired
Rebuttal Expert Disclosures Deadline	12/26/2023	Expired
Discovery Complete	03/07/2024	04/22/2024
Dispositive Motions	04/05/2024	05/25/2024
Joint Pretrial Order	05/06/2024	06/20/2024

13 **IT IS SO STIPULATED.**

THE702FIRM Dated this 17th of January 2024. <i>/s/ Michael Kane</i> <hr/> MICHAEL C. KANE, ESQ. (10096) BRADLEY J. MYERS, ESQ. (8857) 8335 West Flamingo Road Las Vegas, Nevada 89147 <i>Attorneys for Plaintiffs</i>	GREENBERG TRAURIG, LLP Dated this 17th day of January 2024. <i>/s/ Christian Spaulding</i> <hr/> CHRISTIAN T. SPAULDING (14277) 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 <i>Attorneys for Defendant,</i> <i>CLARK COUNTY SCHOOL DISTRICT</i>
WILSON, ELSEY, MOSKOWITZ, EDELMAN & DICKER LLP Dated this 17 th day of January 2024. <i>/s/ Jonathan Pattillo</i> <hr/> JONATHAN C. PATTILLO, ESQ. (13929) 6689 Las Vegas Boulevard, South, Suite 200 Las Vegas, NV 89119 <i>Attorneys for Defendant,</i> <i>DORYS TOVAR</i>	IT IS SO ORDERED. Dated: January 18, 2024  Nancy J. Koppe United States Magistrate Judge